

# **EXHIBIT C**

# JONES DAY

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## VIA EMAIL

Todd Kennedy, Esq.  
Quinn Emmanuel Urquhart Oliver & Hedges, LLP  
50 California Street, 50<sup>th</sup> Floor  
San Francisco, CA 94111

Re: Sony Corporation v. Vizio, Inc., Case no. 08-01135

Dear Todd:

This letter is in response to your letter of June 4, 2009 regarding Sony's request for Vizio to produce for inspection a fully operational exemplar of each of the accused Vizio Products.

As an initial matter, Vizio notes that it does not have an exemplar of each of the accused Vizio Products and therefore will not provide a fully operational exemplar for each of the accused products. Vizio is willing, however, to provide for inspection models of televisions for which it has a fully operational television under its custody and control, provided that Sony also agrees to provide exemplars of its products that are covered by the patents-in-suit for inspection by Vizio.

Regarding the details and procedures for the inspection, Vizio does not object to Sony's desire to complete its inspection with experts, a photographer, and a videographer, subject to the requirements set forth below and pursuant to the terms of the Protective Order governing this investigation.

First, Sony shall provide proposed dates to begin its inspection. Once the parties agree on a date, Vizio will make the sample televisions available for inspection for five consecutive business days. Due to the significant burden this inspection will have on Vizio's business operations, Vizio will not be making the televisions available for inspection again. The sample televisions are an integral part of Vizio's service department.

Second, Sony will conduct all inspection activities at a location convenient to Vizio during regular business hours (9:00 a.m. – 6:00 p.m.). The inspection location will have the sample televisions and electrical power. Sony must provide any other items required for inspection. In addition to Sony's inspection team, Vizio will have an observer present at the inspection location at all times during the inspection process.

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Third, Vizio will authorize and expect Sony to follow the inspection procedures outlined in Todd Kennedy's letter of June 4, 2009. Because Vizio is providing sample televisions that are an integral part of Vizio's service department, these units must remain operational and undamaged. Accordingly, Vizio is willing to allow Sony to inspect these units according to the testing procedures outlined in Todd Kennedy's June 4, 2009 letter, which involves the attachment of devices to the televisions, and the observation of on-screen information related to the testing. Vizio also emphasizes that it does not authorize, and strictly requires that Sony shall not disassemble or remove any part of the sample televisions during the testing procedures, and expects Sony to abide by this requirement.

Fourth, due to the significant burden this inspection will have on Vizio's business operations, Vizio will provide the sample units in groups of 2-3 televisions at a time. When Sony completes its inspection of those units, Vizio will take them back, and then provide another group of 2-3 televisions for inspection. This procedure will continue until Sony has had the opportunity to inspect all the televisions available for inspection. Once Sony has completed its inspection of a television, Vizio will not provide that television again for inspection during the inspection process.

Finally, Vizio will require Sony to make a prior disclosure of the identities of the individuals Sony intends to bring to the inspection. This disclosure will ensure that Vizio has enough time to complete any security clearances for the inspection individuals before they enter the inspection location.

Please let me know if this inspection procedure is acceptable to Sony, and the date when Sony would like to commence its product inspection.

Sincerely,

*/s/ Steven J. Corr*

Steven J. Corr